

EXHIBIT 6

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16-cv-563

RESPONSES TO PLAINTIFF JOSE DAGOBERTO REYES'
FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS

Defendants Waples Project Limited Partnership, Waples Mobile Home Park Limited Partnership and A.J. Dwoskin & Associates, Inc. (collectively "Defendants"), by and through counsel, serve the following Responses to Plaintiff Jose Dagoberto Reyes' ("Plaintiff") First Set of Interrogatories to All Defendants. Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. hereby state that Defendant Waples Mobile Home Park LP is neither the owner of the Park nor an agent of the owner of the Park.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify and describe all interests served by—and reasons and justifications for—your past and present enforcement of any policy (including the Policy), practice, or rule that requires current or prospective tenants to show proof that they are legally present in the United States.

RESPONSE TO INTERROGATORY NO. 1:

Notwithstanding and without waiving Defendants' Objections, please see Defendants' Response to Plaintiff Rosy Giron de Reyes' Interrogatory 16.

Additionally, someone who enters the United States legally is subject to certain review protocols that can identify past criminal conduct in the person's country of origin.

INTERROGATORY NO. 2:

For each interest, reason, or justification identified in response to Interrogatory No. 1, state the dates during which that interest, reason, or justification applied to the relevant policy, practice, or rule.

RESPONSE TO INTERROGATORY NO. 2:

Notwithstanding and without waiving Defendants' Objections, Defendants state that the reasons identified in response to Interrogatory No. 1 applied to the Policy as long as the Policy was in place.

INTERROGATORY NO. 3:

Describe why—as admitted in Defendants’ Answer, *see* Dkt. No. 63, ¶ 3—Defendants did not always enforce the Policy.

RESPONSE TO INTERROGATORY NO. 3:

Notwithstanding and without waiving Defendants’ Objections, Defendants’ senior management team did not always have controls in place sufficient to ensure that Defendants’ employees at the Park were enforcing the Policy. Starting in 2012, Defendants began ensuring that the Policy was enforced at the Park.

INTERROGATORY NO. 4:

Identify all residential properties that you own, manage, or otherwise control, or have in the past owned, managed, or otherwise controlled, and identify (1) those properties that have had or currently have a policy (including the Policy), practice, or rule that requires current or prospective tenants to show proof that they are legally present in the United States, (2) those properties that have not had or currently do not have such a policy, practice, or rule, and (3) the ethnic and racial breakdown of each property.

RESPONSE TO INTERROGATORY NO. 4:

Defendants incorporate and rely on their Objections to Interrogatory No. 4.

INTERROGATORY NO. 5:

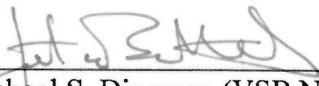
State whether you are aware of other residential landlords in northern Virginia (or elsewhere) who enforce any policy, practice, or rule that requires current or prospective tenants to show proof that they are legally present in the United States, and identify each such landlord you are aware of who enforces such a policy, practice, or rule.

RESPONSE TO INTERROGATORY NO. 5:

Defendants incorporate and rely on their Objections to Interrogatory No. 5.

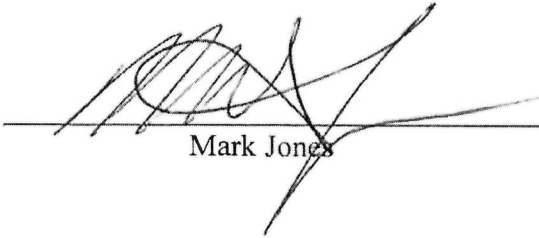
Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT
LIMITED PARTNERSHIP AND
A.J. DWOSKIN & ASSOCIATES, INC.



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Counsel for Defendants

The above Interrogatories have been answered and are true to the best of my ability and knowledge.

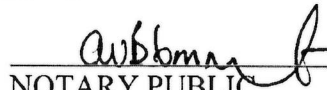


Mark Jones

COMMONWEALTH OF VIRGINIA
COUNTY OF Fairfax

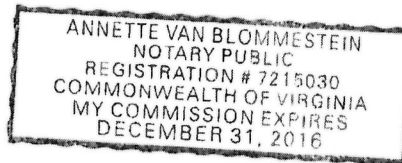
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) to-wit:

SUBSCRIBED and SWORN to before me on this 27 day of October, 2016.



NOTARY PUBLIC

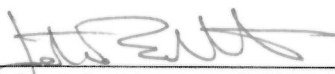
My commission expires: 12/31/2016.



CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2016, I caused the foregoing to be sent to the following via email:

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